

LAW OFFICES
WILLIAMS & CONNOLLY LLP

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

DAVID A. FORKNER

(202) 434-5316

dforkner@wc.com

EDWARD BENNETT WILLIAMS (1920-1988)

PAUL R. CONNOLLY (1922-1978)

November 19, 2019

VIA ECF

Hon. Steven L. Tiscione,
United States Magistrate Judge,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Garadi et al v. Mars Wrigley Confectionery US, LLC*,
Case No. 1:19-cv-03209-RJD-ST

Dear Judge Tiscione:

I write on behalf of Mars Wrigley Confectionary US, LLC ("Mars") to request an extension to file a pleading responsive to Plaintiffs' First Amended Complaint, which was filed on November 12, 2019. *See* Dkt. 14.

The original deadline for a responsive pleading is November 26, 2019. *See* Fed. R. Civ. P. 15(a)(3). No prior request for an adjournment has been made. As discussed with Your Honor during the November 4, 2019 initial conference, counsel for Mars and Plaintiffs have been working cooperatively to exchange information in this matter. The First Amended Complaint, *inter alia*, expands Plaintiffs' theory of liability beyond Plaintiffs' initial challenge to the vanilla used in Mars' Dove Bars®. Mars respectfully requests an adjournment of 24 days (until December 20, 2019) to investigate the expanded allegations and to file its responsive pleading. Plaintiffs' counsel consents to the requested adjournment of time.

Respectfully submitted,

/s/ David A. Forkner

David A. Forkner

cc: All counsel of record via ECF